

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH MULL, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

GOTHAM DISTRIBUTING
CORPORATION AND OLD SCHOOL
VENTURES, INC., individually and
collectively d/b/a OLDIES.COM

Defendants.

NO. 2:24-cv-06083-GJP

JUDGE GERALD J. PAPPERT

**STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANTS'
TIME TO RESPOND TO COMPLAINT**

WHEREAS, on November 13, 2024, Plaintiff Joseph Mull (“Plaintiff”) filed his Complaint (Dkt. 1) against Defendants Gotham Distributing Corporation and Old School Ventures, Inc., d/b/a Oldies.com (“Defendants” and, together with Plaintiff, the “Parties”);

WHEREAS, Defendants’ response to the Complaint was due on or before December 27, 2024 (Dkts. 5–6);

WHEREAS, the Parties have agreed to a 30-day extension of time to respond until January 27, 2025.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, subject to the Court’s approval, that:

1. Defendants shall each respond to Plaintiff’s Complaint on or before January 27, 2025.

Dated: January 3, 2025

/s/ Noelle B. Torrice

Noelle B. Torrice (No. 317928)
1313 North Market Street, Suite 1201
BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP
Wilmington, DE 19801
Telephone: (302) 442-7010
Email: ntorrice@beneschlaw.com

-and-

Stephanie Sheridan
(*pro hac vice forthcoming*)

Matthew P. Farrell
(*pro hac vice forthcoming*)
BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP
100 Pine Street, Suite 3100
San Francisco, CA 94111
Telephone: (628) 600-2251
Email: ssheridan@beneschlaw.com
mpfarrell@beneschlaw.com

Counsel to Defendant Old School Ventures, Inc.

/s/ William E. Hoesche

William E. Hoesche
Elias A. Kohn
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 238-1700
Facsimile: (215) 238-1986
whoesche@kohnswift.com
ekohn@kohnswift.com

-and-

Elliot O. Jackson
HEDIN LLP
1395 Brickell Ave., Suite 610
Miami, Florida 33131-3302
Telephone: (305) 357-2107
Facsimile: (305) 200-8801
ejackson@hedinllp.com

Counsel to Plaintiff

/s/ Michael Conley

Michael Conley
OFFIT KURMAN PC
Ten Penn Center
1801 Market Street, Suite 2300
Philadelphia, PA 19103
Telephone: (267) 338-1300
Facsimile: (267) 338-1335
Email: mconley@offitkurman.com

Counsel to Defendant Gotham Distributing Corporation

SO ORDERED, this _____, day of January, 2025.

The Honorable Gerald J. Pappert